REMARKS

Claims 1-35 remain pending in the application.

35 U.S.C. §102 and §103 Rejections

Claims 1-10, 12-17 and 19-30 stand rejected under 35 U.S.C. §102(e) as being anticipated by "OS/2 Client/Server Toolkit", Angelo R. Bobak, 1995 (hereinafter "OS/2") in view of HP OpenView as taught by Nathan Muller 1995 (hereinafter "OpenView"). Claims 11, 18 and 31-34 stand rejected under U.S.C. 103(a) as being unpatentable over Bobak and OpenView in view of Lorenz et al. (U.S. Patent No. 6,405,366).

1.   Applicant respectfully submits that OS/2 and OpenView, either singly or in combination, fail to teach, "a processor; and a memory coupled to the processor, wherein the memory comprises program instructions configured to implement: component modules operable to define mappings from instrumentation of the components to objects representing those components, and configuration modules operable to configure associations between the component modules for the generation of the management object model" as recited by claim 1.

The Office Action states that "OS/2 teaches a management system for generation of a management object model including a structured hierarchy of objects representing components of a computer system for performing management of the computer system", citing OS/2, page 562, Figure 19.1

Applicant submits that page 562 of the OS/2 reference merely lists various global variables, local variables, and definitions for a "coding exercise" for a "transaction monitor". The OS/2 reference at page 561 describes the "transaction monitor" as "allow[ing] you to interface with either the memory version of the database or any of the databases that our packages support." (OS/2 page 561). Thus the "transaction monitor" being constructed is merely a database access tool that can accept and execute database

transactions or database requests. Figure 19.1 does not appear to be described in the OS/2 reference. However, Figure 19.1 appears to merely illustrate software classes used in creating this database access program, or possibly the "transaction monitor" portion of the program that "accepts [database] transaction requests from a client, executes them, and returns the results to the client process." (OS/2 page 561).

Applicant can find no teaching or suggestion regarding a "management object model" or "a structured hierarchy of objects representing components of a computer system" or a "management object model . . . for management of the computer system". For example, nowhere can Applicant find objects that represent components (e.g., physical resources or components in the system). The software classes shown in Figure 19.1 correspond to various software tasks, such as "event logger", "login monitor", "time keeper", "admin panel", and "kernel" that are used in the database program being created.

With respect to the claim element "component modules operable to define mappings from instrumentation of the components to objects representing those components", the Office Action refers to OS/2 page 610 and Figure 22.1 (Chapter 22). This chapter of the OS/2 reference is also involved with creating software for the database access program begun in Chapter 19. Chapter 22 describes creation of "system configuration logic" and "keyboard logic". The "keyboard logic" is simply software which monitors the keyboard and allows the administrator to enter keystrokes that are interpreted and executed. The Office Action appears to rely on Figure 22.1. Again, Figure 22.1 shows a more detailed software class diagram of the database access program ("transaction monitor") that is being constructed in this exercise. In other words, Figure 22.1 merely shows the software classes used in constructing a database access program ("transaction monitor"). As merely on example, Applicant cannot find any "objects representing those components" or any "component modules operable to define mappings from instrumentation of the components to objects representing those components". In short, this software class diagram for a database program is simply not relevant to the claimed subject matter.

With respect to the claim element "configuration modules operable to configure

associations between the component modules for the generation of the management object model", the Office Action refers again to OS/2 page 562 Figure 19.1 and pages 610-619. The Office Action then states "OS/2 teaches the defining of system objects and being able to generate a management object model." Applicant respectfully submits that this is incorrect. The cited reference in general teaches a student how to create a database transaction program in OS/2. Pages 610-619 appear to teach creation of a "configuration parameter tool" used to create "monitor configuration parameters", i.e., parameters to configure the database transaction program. Applicant submits that the cited reference is simply irrelevant to the present claims.

The Office Action states that "OS/2 does not explicitly teach the program instructions configured to implement" and appears to rely on OpenView to teach this aspect of the claim. Regardless, Applicant has reviewed the OpenView reference and submits that it does not teach or suggest the features lacking from the OS/2 reference as described above.

Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). (Emphasis added)

Applicant submits that OS/2 and OpenView, either separately or in combination, fail to teach or suggest the elements of claim 1. Specifically, OS/2 fails to teach, "a processor; and a memory coupled to the processor, wherein the memory comprises program instructions configured to implement: component modules operable to define mappings from instrumentation of the components to objects representing those components, and configuration modules operable to configure associations between the component modules for the generation of the management object model" as recited by claim 1.

In accordance, claim 1 is believed to patentably distinguish over OS/2. Claims 2-19 are dependent upon claim 1 and are therefore believed to patentably distinguish over the cited references for at least the same reasons.

Likewise, independent claims 20, 21, and 35 recite features similar to those highlighted above with regard to independent claim 1, and are therefore believed to patentably distinguish over OS/2 and/or OpenView for at least the reasons given in the above paragraphs discussing claim 1. Claims 22-34 are dependent upon claim 21 and are therefore believed to patentably distinguish over the cited references for at least the same reasons.

2.   Applicant also asserts that numerous ones of the dependent claims recite further distinctions over the cited reference. For instance:

3.   Applicant submits that OS/2 fails to teach, "wherein a said configuration module is operable to configure a said component module dynamically at run time for a said component that is subject to dynamic changes in status and is further operable to monitor said component for a change in status" as recited by claim 7.

The Office Action contends that the above-referenced feature of claim 7 is disclosed on pages 609 and 611-615 (configuration parameter tool, bottom of page 612). Applicant respectfully disagrees for the reasons cited above.   OS/2   teaches   "The configuration logic will come in the form of two utilities: One allows you to create the file containing the monitor configuration parameters; the other utility allows you to look at the parameters by loading the file." (OS/2, page 609). Again, these are utilities being created for a database transaction program. This cited portion of OS/2 has nothing to do with a system component or resource (physical component or resource) that is subject to dynamic changes in status, and dynamic configuration of a component module for such a physical component, as recited in the claim.

In accordance, claim 7 is believed to patentably distinguish over OS/2.

4.   Applicant submits that OS/2 fails to teach, "wherein a said component module for a component identifies an instrumentation module defining a source of instrumentation for the component" as recited by claim 12.

The Office Action contends that the above-referenced feature of claim 12 is disclosed on page 603 (transRecord). Applicant respectfully disagrees.

At page 603 the OS/2 reference teaches transaction agents that execute database requests against IBM DB/2 databases. This cited portion has nothing to do with "instrumentation of components in the computer system

Accordingly, claim 12 is believed to patentably distinguish over OS/2.

5.   Applicant submits that OS/2 fails to teach, "wherein the instrumentation module comprises a general part and a specific part, the general part being operable to communicate with the specific part via a private interface to obtain instrumentation data, and the specific part being configured to interface with instrumentation for the component to obtain said instrumentation data" as recited by claim 14.

The Office Action contends that the above-referenced feature of claim 14 is disclosed on pages 618-619. Applicant respectfully disagrees.

OS/2 teaches that pop-up panels can be created for the database program to display an event log. This has nothing to do with instrumentation or user interfaces for hardware components, and certainly does not teach the specifics of claim 14.

Accordingly, claim 14 is believed to patentably distinguish over OS/2.

CONCLUSION

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-76400.

Respectfully submitted,

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